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7 UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

8 MIROSLAVA LEWIS,
9 Plaintiff,
10 v.
11 VAIL RESORTS, INC., VAIL
12 HOLDINGS, INC., THE VAIL
CORPORATION, and JOHN DOES 1-3,
13 Defendants.

No. 2:23-cv-00812-RSL

STIPULATED MOTION AND ORDER
TO EXTEND DEADLINE TO FILE
REPLY IN SUPPORT OF VAIL
DEFENDANTS; MOTION FOR
SUMMARY JUDGMENT

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15 I. STIPULATION

16 For good cause shown pursuant to Fed. R. Civ. P. 16(b)(4) and United States District
17 Court for the Western District of Washington Local Civil Rule (LCR) 7(j) and 16(b)(6),
18 defendants Vail Resorts, Inc., Vail Holdings, Inc., and the Vail Corporation (collectively
19 “Defendants”) and Plaintiff Miroslava Lewis respectfully and jointly move for entry of an
20 order extending the deadline for Defendants to file their reply in support of their motion for
21 summary judgment, (Dkt. #74), to January 9, 2025.

22 A court may modify the deadlines in a case schedule or for a summary judgment
23 motion for good cause. Fed. R. Civ. P. 16(b)(4); LCR 7(j); LCR 16(b)(5), (6). This standard
24 primarily considers the diligence of a party seeking the amendment. *Johnson v. Mammoth*
Recreations, 975 F.2d 604, 609 (9th Cir. 1992). Counsel for the parties have been working
25 cooperatively to adjust filing deadlines related to Defendants’ motion for summary judgment
26 and agree that good cause exists for a 3-day extension of the deadline for Defendants to file
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JUDGMENT - 1 2:23-cv-00812-RSL

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the reply in support of their motion for summary judgment:

1. Defendants filed their motion for summary judgment on December 3, 2024. (Dkt. # 74.) Plaintiff's response was due by December 26, with Defendants' reply due by December 31. *See* LCR 7(c)(4).

2. On December 23, Plaintiff filed an unopposed motion to extend the deadline for her summary judgment response by 5 days to December 31. (Dkt. #78.) The Court granted the motion. (Dkt. #79.) Plaintiff filed her response on December 31. (Dkt. #81.)

3. Counsel for the parties conferred and agreed that good cause exists for a similar short extension for Defendants to file their reply in support of summary judgment given the holidays, Plaintiff's short deadline extension, Defendants' non-opposition to Plaintiff's request for an extension, and the lack of prejudice to any party by these short extensions.

Given the above, the parties stipulate the good cause exists to extend the deadline for Defendants to file their reply in support of their pending motion for summary judgment by three days to January 9, 2025.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD

DATED: January 3, 2025

KEATING, BUCKLIN & McCORMACK, INC., P.S.

By: /s/ Richard B. Jolley
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DEFENDANTS; MOTION FOR SUMMARY
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I certify that this memorandum contains 351 words, in compliance with the Local Civil Rules.

DATED: January 3, 2025

SALTZ MONGELUZZI BENDESKY, PC.

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DATED: January 3, 2025

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II. ORDER

THIS MATTER having come on regularly for hearing upon the stipulation of the parties and the Court being fully advised in the premises, now, therefore, it is hereby ORDERED that the deadline for Defendants to file their reply in support of their motion for summary judgment, (Dkt. #74), is continued to January 9, 2025.

Dated this 3rd day of January, 2025.

Mr S Casnik

Robert S. Lasnik
United States District Judge

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